

Donald D. duBoulay
Attorney at Law

305 Broadway, Suite 602
New York, NY 10007

Telephone: (212) 966-3970
Fax: (212) 941-7108
E-mail: dondubessq@aol.com

June 12, 2024

The Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: U.S. v. Randy Bautista
23 Cr. 279 (LTS)

Dear Judge Swain:

I represent Mr. Randy Bautista in the above referenced matter. I write with the consent of the Government and the pre-trial officer to respectfully request that Mr. Bautista's bail bond conditions be modified from home detention with GPS monitoring to stand-alone GPS monitoring.

Mr. Bautista appeared in this District on June 7, 2023. He was subsequently released pursuant to a bail package which included home detention with electronic monitoring, and a \$150,000 unsecured bond signed by three financially responsible persons and oversight by a third-party custodian. Upon his release Randy secured employment almost immediately although that employment terminated several months ago. Randy has since enrolled and attends a trade school. He has recently secured a job, which calls for him to work three days a week, including two-night shifts which require working into the early morning hours (until closing).

The pre-trial officer notes that Randy has been fully compliant with the strict terms of his release, and fully supports this application. Therefore, it is respectfully requested that Randy's bail conditions be amended to stand-alone GPS monitoring.

If the court has any questions, I may be reached at (212) 966-3970

Respectfully submitted,

/s/ Donald duBoulay, Esq.

cc.: Ni Qian, Assistant U.S. Attorney (via ECF)
James Ligtenberg Assistant U.S. Attorney (via ECF)
Marlon Ovalles, USPO Intensive Supervision Specialist

The foregoing request is granted. DE 163 resolved.
SO ORDERED.

6/12/2024

/s/ Laura Taylor Swain, Chief USDJ